

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

LINDI M. MACON	:	BK. NO. 1-13-03503
LAWRENCE W. MACON	:	
Debtors/Respondents	:	
	:	CHAPTER 13 PROCEEDING
	:	
CAPITAL ONE AUTO FINANCE	:	
A DIVISION OF CAPITAL ONE N.A.	:	
Movant	:	
	:	
v	:	
	:	
LINDI M. MACON	:	
LAWRENCE W. MACON	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtors, Lindi M. Macon and Lawrence W. Macon, by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief From Stay filed by CAPITAL ONE AUTO FINANCE, A DIVISION OF CAPITAL ONE N.A., as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.

7. Admitted. By further answer, the debtors are aware they are behind in their post-petition payments. They would like to enter into a stipulation with the movant to cure their arrearage in six months.
8. Admitted.
9. Admitted.
10. Admitted, but by further answer, there would be no need for repossession if movant would allow debtors to sign a stipulation.
11. Denied. This is a conclusion to which no responsive pleading is necessary.
12. Admitted.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,
/s/ James H. Turner
James H. Turner
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4701 North Front Street
Harrisburg, PA 17110
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CERTIFICATE OF SERVICE

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Charles J. DeHart III, Esquire
8125 Adams Drive
Suite A
Hummelstown, PA 17036

Jason Brett Schwartz, Esquire
1333 Race Street
Philadelphia, PA 19107

Date: 3/1/17

/s/ James H. Turner

James H. Turner